

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
MINERVA TORRES MELENDEZ
DEBTOR

CASE NO. 15-00593/BKT

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION ON NON DELIVERY OF TAX
REFUNDS DOCKET NO 58**

TO THE HONORABLE COURT:

NOW COMES, MINERVA TORRES MELENDEZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion On Non Delivery of Tax Refunds*, Docket No. 58, basically stating that the Debtor "...the following tax refunds are pending to be paid into the plan. Tax refunds for years 2015, 2016 and 2017". *Trustee's Motion On Non Delivery of Tax Refunds*, at paragraph 2, Docket No. 58.

2. In reply to the Trustee's motion on non-delivery of tax refunds, the Debtor is submitting to the Trustee (uploaded to the Trustee's system) a copy of the Debtor's tax returns for the years 2015, 2016 and 2017. The abovementioned tax returns reflect that the Debtor **did not receive tax refunds** for the taxable years 2015, 2016 and 2017.

3. The Debtor respectfully requests that for the above stated reasons, the Trustee's motion for non-delivery of tax refunds, Docket No. 58, be denied.

WHEREFORE, based on the above stated, the Debtor respectfully prays that Trustee's motion on non-delivery of tax refunds, Docket No. 58, be denied.

I HEREBY CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; and also certify that I have mailed by

Page - 2 -

Debtors' Reply to Trustee's Motion on Tax Refunds
Case no. 15-00593/BKT13

United States Postal Service copy of this motion to the following non-participant: the Debtor, Minerva Torres Meléndez, Estancia de Santa Barbara 54, Gurabo PR 00778, in the above captioned case..

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 24th day of January, 2019.

/s/Roberto Figueroa Carrasquillo

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